

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

TEAL PEAK CAPITAL, LLC;

Case No. 3:20-CV-01747 (PAD)

*Plaintiff and Counter Defendant,*

And

JOHN MICHAEL GRZAN AND NAMRATA  
KHMAMI

BREACH OF CONTRACT; SPECIFIC  
PERFORMANCE OF CONTRACT;  
REIMBURSEMENT OF FUNDS, COSTS  
AND EXPENSES

*Counter Defendant,*

v.

ALAN BRAM GOLDMAN;

*Defendant and Counter Claimant.*

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**RENEWED MOTION FOR BRIEF CONTINUANCE OF STATUS HEARING [DOCKET  
NO. 110]**

**TO THE HONORABLE COURT:**

COMES NOW Alan Bram Goldman (hereinafter, “Mr. Goldman”), through the undersigned attorney, which very respectfully states and prays:

1. On December 22, 2021, the Court set a hearing for January 19, 2022 to discuss the status of the case and pending motions. *See Docket No. 107.*

2. Due to an unexpected medical procedure, the undersigned requested a brief continuance on January 18, 2022. *See Docket No. 109.*

3. The Court granted the continuance and set a hearing for January 28, 2022. *See Docket No. 110.*

4. On January 20, 2022, the undersigned underwent surgery and was implanted with a pacemaker. The undersigned is currently in recovery awaiting doctors' assessment as to whether the pacemaker is working properly. During this recovery time, the undersigned must rest and avoid physical and emotional strain. Further, the undersigned is left-handed and his movement on that side is restrained.

5. The undersigned's next scheduled appointment with his electrophysiologist is on February 4, 2022. If all goes well, the undersigned will be allowed to retake his pre-surgery work schedule. Therefore, as originally requested, the undersigned requests a continuance of the status hearing between the dates of February 8 and February 11, or soon thereafter.

6. The undersigned has conveyed the situation to Plaintiff's counsel, Mr. Adrián Sanchez, to Courtroom Deputy Clerk, Verónica Otero, and to the Secretary of Hon. Pedro A. Delgado. The parties do not oppose the continuance.

**WHEREFORE**, the Defendant respectfully requests the Court to re-set the status hearing for a date convenient to the Court between February 8, 2022, and February 11, 2022, or soon thereafter.

**I HEREBY CERTIFY** that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which shall notify all counsels of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 25th day of January 2022.

*Attorney for Alan Bram Goldman*

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